

North Pacific Marine Radio Council

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December 29, 2004

**Comments by North Pacific
Marine Radio Council
concerning:
WT Docket No. 04-344 and
RM-10821**

Marlene H Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

The following comments by the North Pacific Marine Radio Council (NPMRC) are in response to WT Docket No. 04-344, released by the Commission on October 15, 2004, and refer to the paragraph numbers in the NPRM.

39. The NPMRC concurs with the Commission's conclusion that the public interest would be served by the designation of Channel 87B and 88B exclusively for AIS use.

Canada has also designated Channels 87B and 88B exclusively for AIS use. It is important for navigational safety reasons to avoid the need for channel switching in the shared waterways of the Strait of Juan de Fuca, Haro Strait and Boundary Passage and adjacent waters.

40. NPMRC supports the elimination of note US223 from the Table of Frequency Allocations. We recommend amending Section 80.373(f) of the Commissions Rules to include the designation of Channels 87B and 88B as AIS Channels. The Commission should consider the future use of Channels 87A and 88A as low power, simplex, ship to ship, noncommercial, commercial or port operations channels.

55. There is no compelling reason to establish a Frequency Coordinator for the AIS Frequencies. We agree with the Commission that the MariTel Frequency Coordinator Proposal should not be adopted.

60. The Commission should not take any action that would restrict the availability of AIS data use by the maritime community. The MariTel Sharing Proposal could inhibit the establishing of beneficial public/private agreements between the Coast Guard and private maritime associations. NPMRC concurs that the MariTel Sharing Proposal should not be adopted.

63. NPMRC agrees with the NTIA Petition that Channels 87B and 88B should be set aside for AIS use only on a nationwide basis.

Sincerely,

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North Pacific Marine Radio Council

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